jointly tested is the Phase I EDI interface for resale orders. See Stacy OSS Aff., ¶ 124. However, that testing process has not been completed. The testing program consists of three sequential tests: (1) end-to-end testing; (2) service readiness testing ("SRT"); and (3) market readiness testing ("MRT").

231. The end-to-end testing stage of the Phase I EDI testing program involves transmitting and receiving an EDI order, but not actual provisioning of the order. In SRT, AT&T sends orders through the entire system, without billing the end users; however, AT&T is billed by BellSouth as part of the testing. The SRT is conducted in a controlled environment, where selected AT&T employees and business customers use a script to place an order, and only eight residential orders and eight business orders can be "in the system" at any given time.

232. MRT, although similar to SRT, is conducted on a larger scale and includes the billing of the end user by AT&T. In addition, whereas SRT is limited to a total of 100 residential and 100 business customers, MRT is open to all AT&T employees and selected business customers.

233. Testing of AT&T orders for business customers is still in the SRT stage. Although all three stages of the Phase I EDI testing program have been completed for residential orders, the testing has revealed substantial problems with the interface (such as errors in data mapping and coding philosophy), even in the controlled environment of SRT. Although the problems encountered in SRT were generally corrected, the results of both the SRT and the MRT for residential service show that the interface is not yet operationally ready, as reflected in the

above-described data on ordering and provisioning.[144]

234. In contrast to the testing that BellSouth and AT&T have conducted of the Phase I EDI interface, it does not appear that any testing has been performed on the Phase II EDI interface -- which is intended to provide substantially greater ordering capabilities than Phase I. AT&T is not aware of any Phase II testing that BellSouth may have conducted with other carriers, nor is any such testing likely to occur.[145]

235. There is also no basis for Mr. Stacy's suggestion that BellSouth has sufficiently tested its interfaces for maintenance and repair. See Stacy OSS Aff., ¶ 129. BellSouth has previously acknowledged that it has conducted no testing with CLECs of the EBI interface, and that it has discarded the data that supports its alleged testing of TAFI.[146]

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[144] Notwithstanding its value, the SRT experience also demonstrated BellSouth's unwillingness to share testing data. As Mr. Stacy has previously acknowledged, the only performance data that BellSouth provided to AT&T regarding the SRT was an order-by-order listing showing the correctness or deficiencies of each order submitted by AT&T. BellSouth would not provide AT&T with other information, such as the amount of time that BellSouth required to process the orders. See Testimony of William Stacy in Docket No. 97-101-C (South Carolina PSC), transcript of July 8, 1997.proceeding, pp. 58-59.

[145] Because of the constant changes in the Phase II EDI specifications by BellSouth, the commencement of testing of the permanent EDI interfaces, and the scheduled implementation of the permanent EDI interface in December 1997, AT&T elected not to test the Phase II interim EDI interface. Although other CLECs have expressed interest in the Phase II interface, it does not appear that any of them are in a position to test (much less use) that interface, given the numerous unilateral changes made by BellSouth.

[146] See Attachment 26 hereto, BellSouth's Response to AT&T's First Set of Interrogatories in Docket No. 960786-TL (Fla. PSC), response to Item No. 10 (c), (e) (EBI was "not tested for CLECs. There is no test data for CLECs using the EBI, because the EBI was built for and used by IXCs"), and attachment thereto entitled "CLEC TAFI Testing," p. 3 ("Once the test results indicated that the CLEC version of TAFI operated as expected, there was no need to retain the

236. Similarly, Messrs. Stacy and Hollett offer no basis for their contention that BellSouth has conducted testing of its daily billage usage file. Stacy OSS Aff., ¶¶ 129, 131; Hollett Aff., ¶ 15. Without actual evidence that BellSouth has performed the testing it claims, with the results that it describes, its claims of testing are not meaningful.

V. BELLSOUTH HAS NOT ESTABLISHED THAT IT HAS ADEQUATE CAPACITY TO MEET CLEC REQUIREMENTS.

237. In addition to failing to show that it has made available nondiscriminatory, operationally ready interfaces for all OSS functions for all resale services and unbundled network elements, BellSouth has failed to show that the OSS interfaces and other access procedures which it proposes will have adequate capacity to handle the volume of CLEC orders and other service requests that can reasonably be expected to occur as local markets become competitive. Aside from offering unsubstantiated capacity figures for some of its interfaces, BellSouth's discussion of the capacity issue amounts to an assertion that BellSouth can be trusted to meet the requirements of the CLECs. That is insufficient.

238. Adequate load carrying capacity is an essential component of establishing the operational readiness of BellSouth's proposed interfaces and related OSS access procedures. An interface or service order processing procedure that operates satisfactorily at low volumes but "chokes" the processing flow for CLEC service orders at actual market volumes will place BellSouth's competitors and their customers at a severe disadvantage.

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raw data"). BellSouth's OSS witness in the Kentucky § 271 proceeding said that she did not even know whether BellSouth conducted any carrier-to-carrier testing of TAFI. See Attachment 51, Kentucky Section 271 transcript, p. 207 (Testimony of Gloria Calhoun).

239. The Commission recognized in the Ameritech Michigan Order that the ability of a BOC to have sufficient capacity, and to handle an increasing volume of orders, "will be a critical component in order for competition to develop in the . . . local exchange market." Ameritech Michigan Order, ¶ 191. Thus, a BOC must show that its systems are designed to accommodate both current and projected demand, are actually handling current demand, and will be able to handle reasonably forecasted demand, both for resale and for UNEs, at an acceptable level of quality. Id., ¶¶ 110, 137-138, 161, 191, 199.

240. Thus, BellSouth cannot demonstrate that it has adequate capacity simply by asserting that its interfaces have operated satisfactorily at volumes currently or previously submitted by the CLECs. As my testimony and the Affidavits of AT&T's other witnesses demonstrate, BellSouth has delayed CLECs, including AT&T, from entering the local exchange market by refusing to comply with its obligations under the 1996 Act (including the obligation to provide nondiscriminatory access to its OSS). The fact that BellSouth has been able to process the relatively small handful of orders and transactions that CLECs have managed to submit despite BellSouth's refusal to open its markets is therefore no indication of its ability to handle the vastly greater volumes that can reasonably be expected in the future, if and when the market is in fact open to competition.[147]

241. In addition, adequate capacity cannot be demonstrated merely by showing

[147] For example, although AT&T has submitted no more than 3,000 orders per week to BellSouth in recent months, AT&T expects that it will be submitting 3,000 orders per day to BellSouth when it is able to enter the local exchange market throughout the BellSouth region.

that an interface has the capacity to handle an aggregate total of orders or transactions. The interface must also have the capability of processing orders simultaneously from all of the CLECs, up to that aggregate capacity, promptly and efficiently. For example, even if BellSouth's resale ordering interfaces have a combined capacity of 10,000 orders per day from a single CLEC, the interfaces nonetheless lack adequate capacity if they cannot handle hundreds or thousands of orders from a number of CLECs at the same time.

242. Finally, adequate capacity cannot be demonstrated by internal testing. BellSouth must demonstrate on the basis of actual commercial usage and robust inter-carrier testing that its systems will process orders at the claimed capacity levels simultaneously for the number of CLECs expected to submit orders and transactions.

243. Capacity should be evaluated by analogy to the long-distance market, where currently more than 50 million customers nationwide change carriers every year. Similar turnover can be expected in local services markets if and when the incumbents open those markets. In order to make local competition a reality, it is imperative that BellSouth be able to handle such turnover. BellSouth, however, has not shown that it has sufficient capacity, as an examination of its gateway and interfaces demonstrates.

A. LEO, LESOG, and SOCS

244. The editing and formatting systems on BellSouth's side of the OSS -- LEO, LESOG, and SOCS[148] -- obviously must have sufficient capacity if CLEC transactions are to flow

[148] BellSouth's Local Exchange Ordering System, Local Exchange Service Order Generator, and Service Order Control System, respectively.

smoothly through the system. If they lack such capacity, they will act as a bottleneck, impeding CLEC access.

245. Mr. Stacy, however, has provided no information regarding the capacity of SOCS. One of his exhibits describes the capacity of LEO and LESOG as 5,000 orders per day each, and he states that "hot spare" arrangements are already in place that could double the capacity. Stacy OSS Aff., ¶ 121 & Exh. WNS-43. This capacity, however, constitutes an average of little more than 500 orders per day for each of the nine states in the BellSouth region -- plainly insufficient to accommodate meaningful competition.

246. Only last May, BellSouth's own outside consultants found that LESOG and SOCS, as well as LENS, have computer programming problems that impact the stability of volume testing, and that the "LESOG host capacity [should] be improved." See id., Exh. WNS-42, pp. 40, 52. In view of this finding, and Mr. Stacy's incomplete and unsupported data, LEO, LESOG, and SOCS cannot be assumed to have sufficient capacity.

B. Pre-Ordering Interfaces

247. With respect to the capacity of LENS as a pre-ordering interface, Mr. Stacy states only that LENS has been designed to support "multiple" pre-ordering transactions for the 5,000 orders that BellSouth expects to receive per day, in addition to handling 1,000 orders per day. Id., ¶¶ 119, 122. However, he fails to describe the total number of pre-ordering transactions that LENS can handle on a daily or hourly basis. Even if, as BellSouth's OSS witness testified in the South Carolina Section 271 proceeding, BellSouth "assumed" three pre-ordering transactions

per order,[149] that testimony cannot demonstrate that LENS has sufficient pre-ordering capacity. First, under BellSouth's "assumption," LENS can handle a maximum of 15,000 pre-ordering transactions per day -- which amounts to approximately 1,700 such transactions per day for each state in the BellSouth region from all of the CLECs. BellSouth has presented no evidence that the number of such transactions will be so limited. To the contrary, given that AT&T alone has forecast 3,000 orders per day and 3,000 pre-ordering inquiries per hour, the stated capacity of LENS is plainly inadequate.[150]

248. Second, BellSouth has presented no basis for its assumption of three pre-ordering transactions per order. The pre-ordering process consists of five possible transactions. Although the actual number of such transactions that are required will vary from order to order, in many cases a CLEC will engage in all five transactions for a particular order -- and even more, if the CLEC needs to retrieve multiple due dates or telephone numbers to satisfy a customer's preference. In fact, the forecasts provided by AT&T to BellSouth assumed that, on average, there would be eight pre-ordering inquiries per order.[151]

249. Third, even if the claimed aggregate pre-ordering capacity of LENS is adequate, BellSouth has presented no evidence regarding LENS' ability to handle simultaneous

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[149] See Testimony of Gloria Calhoun in Docket No. 97-101-C (South Carolina PSC), transcript of July 7, 1997, proceedings, p. 68 (Attachment 16 hereto).

[150] See "Estimated AT&T Order and Inquiry Volumes," dated August 21, 1996 (Attachment 52 hereto), which was provided to BellSouth by AT&T.

[151] Id.

users. When she was asked during the South Carolina Section 271 proceeding how many simultaneous users LENS can support, BellSouth's OSS witness acknowledged that BellSouth had not "found that upper limit of that yet." She could not even give a range.[152]

250. In fact, contrary to Mr. Stacy's assertions, recent experience suggests that BellSouth's pre-ordering interfaces do not have sufficient capacity to handle a large number of CLEC orders. In recent weeks, access to both RSAG and LENS has become unavailable when substantial numbers of AT&T representatives used these systems, even though they fall well within the capacity of these systems as stated by BellSouth.

1. Denial of RSAG Access

251. Access to RSAG, which is the system that BellSouth offers for obtaining access to street address information, is critical, because an order will not be processed without a proper street address. In July 1996, BellSouth asserted that its interim RSAG interface could support 200 simultaneous users and over 700 transactions per hour. However, AT&T's market entry effort in Georgia demonstrated that this claim was unfounded.

252. During the week ending August 9, 1997, AT&T commenced the introduction of its local exchange service into the Georgia residential local exchange market. More than 100 AT&T customer service representatives are used in this effort.

253. As a result of AT&T's marketing efforts during the week ending August 9, the number of service orders submitted to BellSouth increased dramatically from the previous

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[152] Testimony of Gloria Calhoun in Docket No. 97-101-C, supra, pp. 67-68 (Attachment 16 hereto).

week, when AT&T was still in the Market Readiness Testing stage. During the week ending August 2, AT&T submitted 336 orders to BellSouth; during the week ending August 9, 979 orders were submitted. At any given time during the latter week, due to the increased order volumes, numerous AT&T representatives sought access to BellSouth's systems.

254. Beginning on August 6, 1977, AT&T's access to RSAG ranged from extremely limited access to no access whatsoever; the latter situation occurred whenever AT&T had more than 20 representatives seeking access to BellSouth's systems simultaneously, despite BellSouth's prior claim that the interim RSAG interface can support 200 simultaneous users and over 700 transactions per hour.[153] Because of the problems with access, for the first couple of nights when RSAG could not be accessed, AT&T could take no orders, and its representatives were sent home. Thereafter, as RSAG continued to be inaccessible, AT&T representatives were required to take orders on paper for later entry, which delayed the submission of orders to BellSouth.

255. AT&T's substantial loss of access to RSAG lasted from August 6 to August 13. BellSouth's performance improved only after AT&T escalated the issue to the BellSouth executive level, and after AT&T complained to the Louisiana PSC (on August 13). Even after August 13, however, significant problems were encountered in obtaining access to RSAG. On August 18, 22, 27, and 28, AT&T experienced additional access problems, one of which lasted

[153] At the time, pursuant to the provisions of the Interconnection Agreement regarding interim pre-ordering interfaces, BellSouth provided AT&T with access to RSAG through a Local Area Network to Local Area Network connection so that AT&T could perform the pre-ordering function of address validation. See Interconnection Agreement, Att. 15, § 4.5.

nearly two hours (and had not been resolved when the work shift ended), affecting as many as 60 sales representatives at a time. A chronology of the RSAG access problems, including the duration of the lack of access and the sales representatives affected, is set forth in Attachment 53 hereto.

256. The RSAG access problems that occurred between August 6 and September 3 significantly impaired AT&T's marketing efforts. The unavailability of RSAG resulted in a huge backlog of orders awaiting later entry. Hundreds of orders accumulated, due dates quoted to customers were not met, and AT&T's costs increased. Ultimately, and in significant part due to the backlog, AT&T was compelled to reduce its telemarketing efforts to 100 orders per day -- in comparison to the thousands of orders that it had taken per week. Even with these restrictions, the backlog caused by the RSAG problem took AT&T weeks to clear.[154]

257. In its Ameritech Michigan Order, the Commission found that a BOC "should be able to handle, without receiving advance notice from competing carriers, volumes of orders that fall within its stated capacity." Ameritech Michigan Order, ¶ 198. There, the inability of Ameritech to handle adequately an increase in order volume "indicate[d] that Ameritech has not demonstrated that its systems are capable of handling the order volumes and fluctuations

[154] Because the backlog delayed submission of orders to BellSouth, the number of orders actually submitted to BellSouth increased during the last weeks of August, reaching weekly levels of 1,585 orders and 2,737 orders (the highest weekly volumes to date) during the weeks ending August 23 and August 30, respectively. In early September, when AT&T imposed limits on its telemarketing efforts, the weekly volumes submitted to BellSouth then began to decline; 1,870 orders were submitted during the week ending September 6, 1,173 orders during the week ending September 13, and 992 orders during the week ending September 20.

reasonably expected in a competitive marketplace." Id., ¶ 199. The same is true with respect to BellSouth's RSAG. Access to RSAG was denied or impeded, and submission of orders thereby delayed, when AT&T's weekly order volumes did not even exceed 1,000 -- or less than 4 percent of the capacity that Mr. Stacy attributes to BellSouth's systems. Although that weekly level represented an increase of approximately 200 percent from the period preceding market entry, it was not even one-third of the daily volumes that AT&T expects to submit to BellSouth when it is able to make full-scale market entry. Furthermore, the RSAG system failed when it was being accessed simultaneously by only 20 AT&T representatives -- or one-tenth of the capacity alleged by BellSouth. In view of the inability of BellSouth's systems to provide sufficient access in the face of usage that fell well within their stated capacity, BellSouth has not shown that its systems have sufficient capacity to meet the needs of CLECs.

2. Problems With LENS Access

258. AT&T's recent experiences with LENS also raise serious questions concerning the adequacy of LENS' pre-ordering capacity. On August 19, 1997, when approximately 60 AT&T representatives were using LENS to perform a series of address validations and telephone number transactions, more than half of the representatives experienced many "time-out" errors. When AT&T contacted BellSouth's Help Desk, no one was available. When a Help Desk agent returned AT&T's call, she stated that BellSouth had experienced problems with the software that connects LENS with RSAG.

259. Beginning the week of September 22, 1997, AT&T experienced daily problems with LENS. The BellSouth database that validates user identifications frequently

malfunctioned, denying numerous AT&T representatives access to LENS, even though the representatives were placing transactions for no more than 100 orders a day into LENS. Although AT&T immediately notified BellSouth when the problem first occurred, the problem lasted for three days -- and continues to reoccur sporadically.

260. In addition, on September 22 BellSouth asked AT&T to consider "spreading" its LENS users over several LENS servers, rather than sending all of AT&T's traffic to one server. BellSouth explained that it was concerned that AT&T's orders might overload the LENS server that was handling the orders, and that splitting the traffic among several servers would provide more assurance that AT&T would not experience access problems in the future.

261. Although BellSouth ultimately promised to take corrective action on its side of the gateway, and withdrew its request for AT&T to "spread" traffic, AT&T has not been advised by BellSouth that the changes have yet been made. More importantly, the incident raises serious questions about the pre-ordering capacity of LENS. The claimed capacity of the LENS server used by AT&T is 1,000 orders per day (and apparently, 15,000 pre-ordering transactions per day), but the average daily volume of transactions submitted by AT&T has not yet approached that level. During the first three weeks of September -- the month when BellSouth requested this change -- AT&T's total weekly volumes submitted to BellSouth never exceeded 1,870 orders (which equates to between approximately 5,600 and 15,000 pre-ordering transactions). If LENS has adequate capacity, as Mr. Stacy contends, there is no reason why BellSouth would have raised the suggestion of "splitting" traffic in the first place. Moreover, if BellSouth feels compelled to take action in the face of relatively small volumes of traffic at this

stage to avoid access problems on LENS, LENS will likely have even greater capacity problems as larger volumes of orders are submitted in the future.

C. Ordering/Provisioning Interfaces

262. Mr. Stacy does not even describe the capacity of BellSouth's EXACT interface, which purportedly supports the ordering of certain UNEs.[155] BellSouth also has not shown that its two remaining ordering interfaces, EDI and LENS, have sufficient capacity to process the expected volumes of CLEC orders.

263. Mr. Stacy states that: (1) the combined ordering capacity of the EDI interface and LENS "has been verified" as being at least 5,000 orders per day (1,000 orders for LENS, and 4,000 orders for the EDI interface); and (2) this capacity could be "readily increased" to at least 10,000 orders per day (2,000 orders for LENS, and 8,000 orders for the EDI interface). Stacy OSS Aff., ¶¶ 119, 121. Mr. Stacy's analysis, however, is flawed in a number of respects.

264. Mr. Stacy bases his capacity analysis of BellSouth on what he describes as BellSouth's "forecast information" for 1997. Id., ¶¶ 120, 125. This assumption is unreasonable. A number of CLECs, including AT&T, are seeking to compete aggressively in the BellSouth region, which consists of more than 15,000,000 residential access lines and 6,700,000 business

[155] The fact that EXACT is currently being used by BellSouth to process access requests from interexchange carriers does not mean that EXACT has sufficient capacity to handle orders from CLECs for UNEs. The number of local service customers of CLECs is likely to be many times greater than the number of interexchange carriers currently served by BellSouth. It will therefore be important to test the capacity of the EXACT interface to process successfully and promptly the increased volume of orders for local exchange service.

access lines.[156] Given the substantial turnover expected in the local exchange market as a result of this competition, it is illogical to assume that only 5,000 --- or even 10,000 -- orders will be submitted on a daily basis by all of the CLECs in the entire nine-state BellSouth region.

265. The unrealistic nature of BellSouth's forecasts is evidenced by the failure of Mr. Stacy to provide any basis or supporting documentation for them, including the specific forecasts that BellSouth allegedly received from CLECs. See Stacy OSS Aff., ¶ 120 & Exh. WNS-44. BellSouth's forecast of 156,000 resale orders for 1997 (which, inexplicably, forecasts no volumes at all prior to June 1997), has likely already been exceeded, given BellSouth's previous representation in discovery that it had received 130,000 resale orders through July. Id., Exh. WNS-44, p. 1. BellSouth's 1998 forecast of 489,000 resale orders and 105,000 UNE orders is equally unreliable. Id., Exh. WNS-44, p. 2. For example, AT&T has previously supplied BellSouth with a region-wide forecast of 3,000 orders per day -- which constitutes 60 percent of the alleged current combined capacity of LENS and the EDI interface. Thus, Mr. Stacy's forecast assumes that all of the other CLECS would submit a combined daily total of not more than 2,000 orders per day for the entire BellSouth region. That is an inherently implausible scenario, in view of the fact that the other CLECs include large-scale carriers such as MCI and Sprint.

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[156] According to BellSouth's Form 10-K filed with the Securities and Exchange Commission, as of December 31, 1996, BellSouth had a total of 22,135,000 access lines in service, of which 15,136,000 were residential and 6,732,000 were business. See BellSouth Form 10-K For the Fiscal Year Ended December 31, 1996 (February 1997), p. 16. As of the end of the second quarter of 1997, BellSouth served a total of 22,717,000 residential and business access lines. See "BellSouth Reports Strong Second Quarter Earnings," BellSouth news release dated July 21, 1997.

266. Mr. Stacy's analysis also assumes that LENS and the EDI interface can be used interchangeably by any carrier. In fact, large-scale carriers such as AT&T can and will use only the EDI interface, given the numerous deficiencies in LENS -- which, as Mr. Stacy has previously admitted, was designed "for the small carriers."[157] The EDI interface's current alleged capacity of 4,000 orders per day is plainly insufficient to support all of these carriers, since AT&T alone expects to submit 3,000 orders per day via the EDI interface.

267. Mr. Stacy's assertion that BellSouth could "readily increase" the combined capacity of LENS and the EDI interface to at least 10,000 orders per day is unpersuasive. Id., ¶ 121. He provides no evidence to support this position, and does not even describe the period of time that would be required to implement the capacity increase. His assertion is also inconsistent with BellSouth's recent submission to the Department of Justice on September 15, which estimated that it would need 90 days to double the capacity of its ordering interfaces. See Stacy Aff., Exh. WNS-52, p. 118, Table 6-2. It is cold comfort to competing carriers that, if their orders are backlogged due to insufficient interface capacity, BellSouth can "readily increase" capacity in 90 days.

268. In addition to the lack of evidence that its interfaces have sufficient capacity to process orders electronically, BellSouth has not shown that, to the extent orders must be processed manually by BellSouth, BellSouth has devoted the personnel and resources to handle those orders in a timely, accurate, and reliable manner. Using the analysis prepared by BellSouth's

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[157] See ¶ 84, supra; Deposition of William N. Stacy in Docket No. 960786-TL (Fla. PSC), August 14, 1997, pp. 55-56 (Attachment 13 hereto).

outside consultant in its analysis of the LCSC, Mr. Stacy describes that the LCSC is handling 1,625 local service requests per day, with a total processing capacity of 3,325 requests per day.[158] However, that volume is even lower than the claimed combined capacity of its electronic interfaces.

269. More significantly, BellSouth is receiving most of its orders manually. Based on BellSouth's discovery responses, the LCSC received and processed more than 100,000 resale orders manually between January 1 and July 31, 1997. Although that volume is within the capacity stated by Mr. Stacy, future volumes are likely to be vastly greater, unless the CLECs currently submitting orders by facsimile utilize electronic interfaces. Consequently, it cannot be assumed that the LCSC's current capacity can handle future volumes. The "contingency plans" cited by Mr. Stacy are little more than promises to take action in the future -- which are irrelevant to the issue of a BOC's current compliance with its obligations. Id., ¶ 121.

D. The Maintenance and Repair Interfaces

270. BellSouth's repair interfaces, TAFI and T1M1 EBI, also lack sufficient capacity to handle effectively and efficiently the combined operational requirements of all new entrants. In fact, BellSouth does not even discuss the capacity of T1M1 EBI, which AT&T would prefer to use and is the only repair interface that can be used to order repair and

[158] Stacy OSS Aff., ¶ 133 & Exh. WNS-47; DeWolff August 15 report, p. 8 & attached Capacity/Capability Chart (Attachment 44 hereto).

maintenance of certain UNEs.[159] Although Mr. Stacy claims that the capacity of TAFI is adequate, the facts do not support his assertion.

271. Mr. Stacy claims that TAFI currently has the capacity to support 130 simultaneous users, and 2,600 troubles per hour, throughout BellSouth's nine-state region. In addition, he states that this capacity can be increased "almost immediately" to a total of 195 users, or 3,900 troubles per hour. Stacy OSS Aff., ¶ 127. The combined operational requirements for new entrants, however, may be much higher. Each new entrant needs to be able to have all of its repair attendants logged onto TAFI simultaneously, in order to provide timely service to their customers. Otherwise, a new entrant's repair attendant will have to log onto TAFI every time he receives a trouble report for a customer in BellSouth territory. New entrants, particularly larger national carriers, have large numbers of repair attendants who will need to be logged onto TAFI. Because of TAFI's inadequate capacity, new entrants will have to have at least some of their repair attendants log onto TAFI each time they receive a trouble report from a customer. The time consumed in logging onto TAFI, and the distinct possibility that there will be no open "slots" when the representative attempts to log on, will prevent the provision of timely service.[160]

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[159] Because EBI is currently used by interexchange carriers for access services, its capacity (like the capacity of EXACT) cannot be assumed to be adequate to handle the expected volumes of CLEC orders. See fn. 155, supra.

[160] Although Mr. Stacy contends that BellSouth has conducted tests to ensure that TAFI can handle commercial volumes, he provides no details, results, or description of those tests. Stacy OSS Aff., ¶¶ 126, 128. In any event, the volumes involved were only a fraction of TAFI's alleged capacity, and therefore provide no indication of the volumes that TAFI can actually handle. Id. The ability of TAFI to handle current volumes (which are low, due to the barriers to entry erected by BellSouth) is no indication of the current ability of TAFI to handle reasonably foreseeable

272. By contrast, BellSouth's systems are not subject to these user limitations, because -- as Mr. Stacy admits -- BellSouth maintains a separate TAFI system for its own retail operations. Id., ¶¶ 89, 91. This difference is clearly discriminatory.

E. The Billing Interfaces

273. BellSouth has offered no evidence to support Mr. Stacy's statement that its CLEC daily billable usage system has sufficient capacity to process daily usage files for CLECs. Id., ¶¶ 130-132. The only basis that Mr. Stacy offers for his position is the fact that BellSouth "has not identified any constraints to its capacity to process daily usage files for CLECs," and that its systems have "spare capacity." Id., ¶ 131. BellSouth's ability to process current volumes, however, is no indication of its ability to handle the far greater volumes that can be expected in the future. Since BellSouth provides CLECs with only a portion of the usage data that it records and should be providing (¶ 220, supra), Mr. Stacy understates the load that must be accommodated.

F. BellSouth's Claims of Capacity Testing

274. Mr. Stacy's various claims that BellSouth has performed the necessary capacity testing on its various interfaces is belied by his own testimony and exhibits. See Stacy OSS Aff., ¶¶ 118-123, 126. BellSouth has not even completed the capacity testing that it is performing, as evidenced by Mr. Stacy's acknowledgment that IBM -- which performed a "preliminary review" of BellSouth's volume testing methodology when such testing was in its

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demand volumes. See Ameritech Michigan Order, ¶ 138.

initial stages in May -- "will return when stress testing is completed," which is not expected until November 1997. Stacy OSS Aff., ¶ 118; Exh. WNS-42.

275. Furthermore, the only "evidence" of testing that Mr. Stacy provides in support of his claim of capacity testing is a four-page series of bar graphs that summarize the results of tests (apparently internal) conducted by BellSouth. Id., ¶ 123 & Exh. WNS-45. The charts are unaccompanied by any underlying data or documents, or even by a description of the methodology that was used (other than Mr. Stacy's assertion that the BellSouth testing plan incorporated the recommendations of IBM). See id. At best, they show that some kind of volume testing was performed on a few selected days (one of which was conducted less than two weeks prior to the filing date of BellSouth's Section 271 application). Id. This is plainly insufficient to support BellSouth's claim of sufficient capacity.

VI. CONCLUSION

276. In light of the operational and capacity limitations of its current interfaces, BellSouth's claim that it has already met its checklist obligations with respect to OSS is unfounded. Despite AT&T's repeated requests and persistent efforts, BellSouth does not have in place electronic interfaces that are providing, or could provide, CLECs with nondiscriminatory access. BellSouth has not even provided interface specifications that would make it feasible for AT&T or any other CLEC to avoid the dual data entry required by the LENS interface, or to provide service using UNE combinations. BellSouth also has not yet provided stable or complete specifications and other necessary information for its ordering and provisioning interfaces for resale. Thus, there is a significant amount of work to be completed before interfaces providing

nondiscriminatory access to BellSouth's OSS can be deemed operationally ready and commercially available even for resale purposes; and BellSouth has even farther to go with respect to UNE OSS.

FCC DOCKET CC NO. 97-208
AFFIDAVIT OF JAY M. BRADBURY

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge and belief.

Executed on October 14, 1997.

Jay M. Bradbury

SUBSCRIBED AND SWORN TO BEFORE ME this 14th day of October, 1997.

Sheila C. Calbert
Notary Public

My Commission Expires:

Notary Public Gwinnett County, Georgia
My Commission Expires March 14th, 1999

ATTACHMENT 1

ATTACHMENT 1

AT&T'S ATTEMPTS TO SECURE NONDISCRIMINATORY ACCESS TO BELLSOUTH'S OPERATIONS SUPPORT SYSTEM

The establishment of efficient and effective electronic interfaces and procedures for the exchange of information between the operations support systems of BellSouth and AT&T and other CLECs is essential for the development of competition in the provision of local services. AT&T and other CLECs entering local markets on a large scale are highly dependent upon their ability efficiently to obtain local services and unbundled network elements from BellSouth, which requires efficient, real-time exchange of information between CLECs and BellSouth relating to all of the OSS functions. Without nondiscriminatory access to BellSouth's operations support systems, large-scale, broad-based entry by CLECs into local markets will be delayed or foreclosed, and consumers will be denied the intended benefits of competition in local telephone services -- choice, new and innovative services, and lower prices.

Accordingly, AT&T first requested that BellSouth provide electronic access to its OSS more than two years ago. As I explain below, from the time of that request, BellSouth has refused to provide nondiscriminatory access. Initially denying that it had any obligation to provide nondiscriminatory access to its OSS, BellSouth has refused to provide AT&T detailed specifications of the interfaces being developed so that AT&T may engineer its side of the interfaces, has offered only interfaces that required substantial human intervention, and -- without notice to AT&T -- has diverted its efforts from development of electronic interfaces needed to support high-volume competitive efforts and focused on BellSouth's proprietary web-based system, which (by BellSouth's own admission) is designed to support only relatively small CLECs.

As a result, AT&T has been forced to rely on BellSouth's discriminatory, interim processes to support its planned entry into the market.

Since the time of AT&T's first request for access to BellSouth's OSS, AT&T and BellSouth agreed to conduct OSS negotiations on a BellSouth region-wide basis, which is appropriate because BellSouth's OSS are designed to serve the entire region. Thus, although AT&T's dealings with BellSouth with respect to OSS have focused to date on AT&T's plans to enter the local exchange market in Georgia, the course of dealings between the two companies is equally relevant to -- and has affected the availability of -- electronic access to BellSouth's OSS in all states in the BellSouth region, including South Carolina.

On July 1, 1995, local service competition was authorized in Georgia under the Telecommunications and Competition Development Act of 1995 (O.C.G.A. § 46-5-160, et seq.). AT&T immediately began evaluating entry into the Georgia local services market. In August 1995, AT&T and BellSouth had their first executive-level meetings to discuss local interconnection. This was followed by a meeting of AT&T and BellSouth subject matter expert team leaders, including myself, on September 8, 1995.

From the remainder of September 1995 through December 1995, AT&T had at least two dozen meetings with BellSouth on interconnection issues, including access to BellSouth's OSS. During this period, AT&T transmitted to BellSouth: (1) AT&T's "Total Service Resale Requirements," which stressed the need for electronic access to OSS for the resale of BellSouth's services; (2) AT&T's "Loop Resale Requirements" concerning access to, and use of, the unbundled loop in the provision of competitive local exchange services, and (3) a draft of AT&T's "Electronic Communications Interface Provisioning Object Requirements," which

described the data elements and message contents for pre-ordering and ordering transactions between AT&T and incumbent LECs, such as BellSouth.

BellSouth, however, consistently maintained during the September-December 1995 period that AT&T (and other new entrants) did not need electronic interfaces to BellSouth's OSS and that such interfaces were not legally required. In response to AT&T's submissions of its requirements for resale of BellSouth's services and access to the unbundled loop, BellSouth simply sent AT&T a copy of BellSouth's OLEC (Other Local Exchange Carrier) Ordering Guidelines.

The ordering guidelines provided by BellSouth were plainly inadequate, because they provided for manual, rather than electronic, interfaces. Moreover, even if the ordering guidelines were intended for electronic ordering (and they were not), BellSouth's response to AT&T's requests ignored the nature of the process that must be followed before interfaces can be deemed operationally ready. The process necessary to achieve operational readiness is complex and multi-step, requiring extensive negotiations between the parties, development of systems and systems requirements, and comprehensive testing (both internal testing and inter-system testing). Operational readiness cannot be achieved simply by providing a CLEC with an ordering guide.

Because of the lack of progress with BellSouth, AT&T filed a petition with the Georgia PSC on December 21, 1995, asking the PSC to order BellSouth to provide nondiscriminatory electronic interfaces to BellSouth's OSS. While AT&T awaited the results of that petition, it continued to press BellSouth on the need for electronic interfaces. On February 1, 1996, AT&T sent BellSouth updates to its requirements – Standard Access Billing Requirements